West Virginia Department of Environmental Protection Division of Air Quality

Fact Sheet



For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on January 15, 2019.

Permit Number: **R30-07900072-2019**Application Received: **November 15, 2019**Plant Identification Number: **07900072**

Permittee: Toyota Motor Manufacturing West Virginia

Facility Name: Buffalo Plant

Mailing Address: 1 Sugar Maple Lane, P.O. Box 600, Buffalo, WV 25033

Permit Action Number: MM02 Revised: June 26, 2020

Physical Location: Buffalo, Putnam County, West Virginia

UTM Coordinates: 413.518 km Easting • 4,272.153 km Northing • Zone 17

Directions: The facility lies directly east of WV State Route 62 approximately one

(1.0) mile south of Buffalo, WV

Facility Description

Toyota Motor Manufacturing West Virginia (TMMWV) is primarily engaged in the manufacturing of automotive engines and automotive transmissions. As part of this manufacturing process, the plant contains machining, assembly, engine testing, and support operations. To support these operations, the plant is equipped with heating ventilation and air conditioning units, as well as various storage tanks (e.g., gasoline, motor oil, etc.). The SIC code for this facility is 3714.

This modification is to make various equipment and process changes at the facility including the removal of Project Activities 6 and 10. Other changes include additional space heating capacity in the AT building and an increase in the annual throughput of laser clad copper coating.

Emissions Summary

The changes made in this modification will result in the following changes to the facilities potential emissions.

Pollutant	Change in Potential Emissions (+ or -), TPY
CO	+1.99
NO_x	+2.37
SO_2	+0.01
$PM/PM_{10}/PM_{2.5}$	+0.50
VOCs	-16.32
HAPs	-0.03

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 148.37 TPY of CO and 233.14 TPY of VOCs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Toyota Motor Manufacturing West Virginia is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open burning prohibited.
	45CSR7	Particulate air pollution from manufacturing.
	45CSR13	NSR Permits.
	45CSR21	To Prevent And Control Air Pollution from
		The Emission Of Volatile Organic
		Compounds
	45CSR30	Operating permit requirement.
State Only:	45CSR§21-40	To Prevent And Control Air Pollution from
		The Emission Of Volatile Organic
		Compounds

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

The Active Permits/Consent Orders affected by this modification are as follows:

Permit or	Date of	Permit Determinations or Amendments That
Consent Order Number	Issuance	Affect the Permit (if any)
R13-2062O	March 17, 2020	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

The following changes were made as part of this modification:

1.1. Emission Units

Machining, Welding, and Assembly Operations

• The following emission sources were removed from the Emissions Unit table: Project #6 and Project #10.

Engine Head Copper Coating

• Updated the design capacity for laser clad copper coating of engine heads to reflect an increase in cladding operations from 324,000 units/year to 648,000 units/year.

3.0 Facility-Wide Requirements

• Condition 3.5.10 was updated to reflect changes made in R13-2062O.

4.0 Machining, Welding, and Assembly Operations [Project # 1 to 19] & Surface Coating Operations

- In Condition 4.1.2, Projects #6 and #10 were removed from the table and the emission limits were updated.
- In Condition 4.1.3, Projects #6 and #10 were removed from the table and the Project #19 and Exhaust Fans PM Emission Limits were adjusted to account for the additional comfort heating capacity (total of 5.56 mmBtu/hr) to reflect the expansion of the Automatic Transmission building (and subsequently update the facility-wide natural gas combustion limitation).
- Conditions 4.1.7 and 4.1.8 were updated to reflect changes made in R13-2062O.
- In Condition 4.1.21.d, the VOC and HAPs Emission Limits were updated.
- Condition 4.4.8 was updated to reflect changes made in R13-2062O.

5.0 Combustion Operations, Testing and Heat Treatment

• Conditions 5.1.1, 5.1.2, and 5.1.3 were updated to reflect changes made in R13-2062O.

• The Aggregate Combustion Sources Emission Limits table in condition 5.1.6 was revised to split the Natural Gas/Propane Combustion source into two sources: Natural Gas (HVAC/Comfort) and Propane (Heat Treatment).

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

None.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: Not Applicable for minor modifications.

Ending Date: N/A

Point of Contact

All written comments should be addressed to the following individual and office:

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Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

Not applicable.